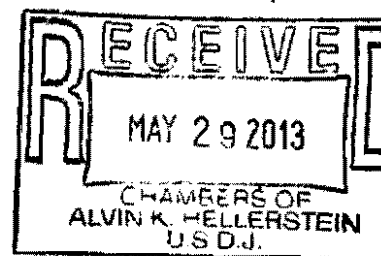


Hellerstein, P.



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

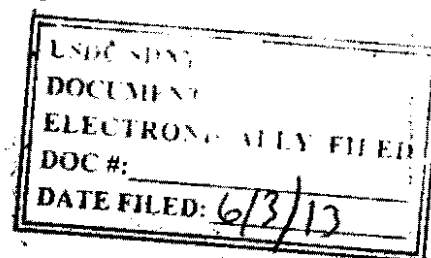
Plaintiffs,

-against-

THE REPUBLIC OF CUBA,

Defendant.

12-CV-1596 (AKH)



WHEREAS, the above-referenced plaintiff-judgment creditor is seeking discovery in connection with its effort to enforce the judgment entered in favor of Aldo Vera, Jr., as Personal Representative of the Estate of Aldo Vera, Sr., in the above-referenced action;

WHEREAS, in connection with that discovery, plaintiff-judgment creditor is seeking the production of documents relating to blocked accounts maintained with various banks in which The Republic of Cuba or its agencies and instrumentalities have or may have a property interest;

WHEREAS, plaintiffs and several such banks entered into the annexed protective agreement and order, which was so ordered by the Court on January 14, 2013,

WHEREAS, Deutsche Bank Trust Company Americas ("DBTCA") wishes its production of documents to the plaintiffs to be subject to the protective agreement and order,

WHEREAS, the protective agreement and order provides in paragraph L that additional parties may agree to be subject to its terms by signing a counterpart thereof and by serving a copy of the other parties thereto,

WHEREAS, DBTCA is prepared to join and become a party to the protective agreement and order;

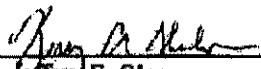
IT IS HEREBY STIPULATED AND AGREED, between counsel for plaintiffs and counsel for DBTCA, as follows:

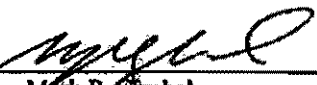
1. Production of documents by DBTCA in this action shall be subject to the annexed protective agreement and order, as so ordered by the Court on January 14, 2013.
2. Entering into this stipulation shall be deemed to have the same force and effects as execution of a counterpart to the protective agreement and order as provided in paragraph L thereof.
3. Upon execution, this stipulation shall have the effect of an agreement between the signatories hereto and is not conditioned on any eventual court order, if any approving this stipulation.

Dated: New York, New York
February 19, 2013

ANDERSON KILL & OLICK, P.C.

COVINGTON & BURLING LLP

By: 
Jeffrey E. Glen
Kerry A. Sheehan

By: 
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Attorneys for Aldo Vera, Jr., as Personal
Representative
of the Estate of Aldo Vera, Sr.

Attorneys for Deutsche Bank
Trust Company Americas

SO ORDERED:


~~February~~ 2013

U.S.D.J.